

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

-----X

SYMBIONT SCIENCE ENGINEERING AND
CONSTRUCTION, INC.; ZURICH COMPANY
a/s/o Symbiont Science, Engineering and Construction, Inc.;
AMERICAN GUARANTY AND LIABILITY
INSURANCE COMPANY a/s/o Symbiont Science
Engineering and Construction, Inc.; and STEADFAST
INSURANCE COMPANY a/s/o Symbiont
Science Engineering and Construction, Inc.,

Plaintiffs,
vs.

Case No.:
3:22-cv-04905-MAS-LHG

Return Date:
February 6, 2023

ORAL ARGUMENT
REQUESTED

GROUND IMPROVEMENT SERVICES, INC.;
JOHN DOES 1-10, (fictitious parties) and ABC C
OMPANIES 1-10 (fictitious parties); GEO-
STRUCTURES OF VIRGINIA, INC., Defendants,
GROUND IMPROVEMENT SERVICES, INC.
and GEOSTRUCTURES OF VIRGINIA, INC.,

Third-Party Plaintiffs,
vs.

GEOPIER FOUNDATION COMPANY, Inc. and
GZA GEOENVIRONMENTAL, INC.

Third-Party Defendants.

-----X

NOTICE OF MOTION TO DISMISS ON BEHALF OF THIRD-PARTY DEFENDANT

PLEASE TAKE NOTICE, that on Tuesday February 21, 2023, or as soon thereafter as
counsel may be heard, the undersigned attorneys for Third-Party Defendant GZA
GEOENVIRONMENTAL, INC. shall move this Court for an order, pursuant to FRCP 12(b)(6),
dismissing the Third-Party Complaint and Plaintiffs' Rule 14(a)(3) Complaint against movant.

Said Third-Party Defendant shall rely upon the attached affirmation and exhibits, which includes a proposed Order, and the accompanying Memorandum of Law.

Dated: New York, New York
January 20, 2023

DONOVAN HATEM LLP

By:



Stephen F. Willig
Attorneys for Third-Party Defendant
GZA GeoEnvironmental, Inc.
112 West 34th Street, 18th Floor
New York, New York 10120
(212) 244-3333

To:

All Counsel via electronic filing